



Butte County

LAND OF NATURAL WEALTH AND BEAUTY

WATER AND RESOURCE CONSERVATION

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PAUL GOSSELIN
Director

California Water Plan Update 2013
Attention: Paul Massera
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

In Re: Sacramento River Hydrologic Region Regional Report

Dear Mr. Massera:

A critical component of California Water Plan Update 2013, the Sacramento River Hydrologic Region Regional Report (Regional Report), was only recently provided to the public for comment. With a release date of October 23, 2013 and a response deadline of December 9, 2013, provided the public an unsatisfactory process for critical review of the document. Due to these constraints, these comments have been reviewed and supported by the Butte County Water Commission and are coming from the Department, rather than the Board of Supervisors. The truncated timeline was insufficient, which did not allow enough time to take our comments through the formal process for approval by the Board of Supervisors.

With that constraint in mind, this letter will serve as Butte County's input on the Regional Report. We will proceed by offering some high level observations about what we see lacking in the report and conclude with an attachment which contains some specific language alternatives, by page and line number, referenced to the document itself.

As the area of origin for the majority of California's water supplies, the needs of this region in particular should be taken into consideration and properly reflected in this Regional Report. The following is a list of the underlying themes of the Regional Report that must be addressed for the document to begin to reflect the unique qualities of the region. These issues are presented in order of priority of angst by the County and represent critical concerns of the region.

- 1) The document fails to include an in-depth discussion regarding the agricultural economy of the region. While there is some reference to the types of crops that are grown within the region, the importance of the agricultural economy is not presented well in the document. We feel there needs to be a linkage between the agricultural economy of the region and the need for a reliable supply of both surface and groundwater within the region prior to any contribution to statewide needs. The need for a reliable supply of water for economic growth and sustainability within the region is not addressed.

- 2) The picture painted by the current regional report is that the water merely flows through the region to support the fisheries. While the fisheries are an important component of the need for a reliable supply of high quality water for the environment, there are also many other environmental users of water within the region. Water sustains native habitat niches used by flora and fauna, including many identified endangered species that are found within the region. The lack of discussion regarding water for critical habitat within the region is alarming.
- 3) There is little or no discussion of the California water rights system or the senior water rights held by the irrigation and water districts, primarily within the Sacramento Valley portion of the region. The document fails to recognize the contribution made by these special districts in the management of the surface water within the region for agricultural supplies and flood control. Proper management of the surface water supply by the districts also contributes to the sustainability of the groundwater basins by providing both in-lieu and direct recharge. The balance of reliable surface water and groundwater supplies within the region are critical to the sustainability of the robust agricultural economy, our rural communities, as well as the environment. Failure to address this contribution is a fatal flaw of the document.
- 4) The discussion regarding the Central Valley Flood Protection Board and the associated planning efforts within the region is incomplete. There are nine planning processes currently developing flood management documents and the document only discusses one joint effort, the Mid and Upper Sacramento River. The Regional Report fails to include the Feather River and Lower Sacramento/North Delta planning regions, which are also within the Sacramento River Hydrologic Region. There also needs to be a discussion of the devastation caused to the region by periodic large scale flooding as well as the routine nuisance flooding that occurs within the Sacramento Valley to alleviate flooding in the urban areas further down in the system. For example, Highway 162 is often rendered inaccessible due to nuisance flooding prohibiting travel between Butte and Glenn Counties for extended periods of time nearly every year during storm events. There is also an associated cost to agriculturalists needing to re-level their fields/orchards prior to spring planting/bloom because of the damage done during this type of flooding.
- 5) There are eight specific Integrated Regional Water Management planning efforts in the Sacramento River Hydrologic Region. Although, it appears that there may be a plan to add more information regarding the Integrated Regional Water Management Plans within the Sacramento Hydrologic Region, the public draft is incomplete and thereby deprives the public from commenting on these very important plans. We suggest that the goals and objectives of the various planning documents should be presented in some type of table format for easy processing by the reader. It is irresponsible to gloss over these efforts, especially since the State routinely refers to various IRWMPs as key to the future management of water for California.

While these five themes must be incorporated and discussed in more depth in the Regional Report, we also have found several specific omissions or inconsistencies within the body of the document, which we will list by page and line in the attachment to this letter.

We understand that your planning process is concluding. However, the late release of this document to the public is an avoidable and egregious error by DWR. We are aware that all other regional reports were released in draft for public review one or more times beginning in spring 2013, which allowed for a more in-depth and meaningful review by the public. This internal blunder and some arbitrary and insufficient deadline for comments should not deter DWR from producing a useful report, which truly reflects the unique components of the Sacramento River Hydrological Region. We urge you to address the points made in this comment letter and produce a document for inclusion in the California Water Plan Update 2013 which takes into consideration the needs of the economy and environment within the Sacramento River Hydrologic Region.

Sincerely,

A handwritten signature in black ink, appearing to read "Vickie Newlin", with a long horizontal flourish extending to the right.

Vickie Newlin, Assistant Director
Butte County Water and Resource Conservation
CA Water Plan Update 2013 PAC Member

Attachment

cc: Butte County Water Commission

California Water Plan Update 2013
Sacramento River Hydrologic Region Report
Specific Comments by Butte County*

- 6 Page 1; line 33 – second to last word, change ‘that’ to ‘the’ - grammatical error
- 7 Page 2 – 6; overall comment – language should include information on local partnerships to accomplish fish passage improvements including watershed groups, special districts, etc. as well as local financial contributions, which were in the millions of dollars.
- 8 Page 11; Well Infrastructure discussion: suggest adding a map for clarification.
- 9 Page 11; line 28 – numbers at the end of this line – needs clarification.
- 10 Page 14; line 1 – 30 – need to include greater discussion of multi-completion monitoring wells and locations, as well as local efforts to secure bond funding to install them.
- 11 Page 15; line 15 and 16 – need to include information of where additional information is furnished.
- 12 Page 15; line 20 through 41 and page 16; line 1 through 4 – need to include information regarding local contributions by counties to this effort.
- 13 Page 17; line 21 through 40 and page 18; line 1 through 2 – need to include discussion regarding costs of flood damage at the local level and also nuisance flooding costs that occur almost every year.
- 14 Page 18; line 10 through 15 – question the accuracy of the statistic and request reference.
- 15 Page 19; line 11 through 15 – suggest perhaps adding in agricultural economic discussion here.
- 16 Page 20; line 22 through 36 and page 21; line 1 through 38 – the discussion regarding surface water supplies is incomplete. There should be more information on water rights vs. contract water vs. settlement contracts, etc.
- 17 Page 21; line 39 through 42 and page 22; line 1 through 17 – this discussion regarding the valley “geologically, the valley is a large trough filled with sediments...” has been questioned over the years. What is the source of this particular reference and is it current and agreed upon by scientific experts and/or by DWR?
- 18 Page 22; Line 18 – Shouldn’t this be “2005-2010 Average Estimated Annual Groundwater Supply and Trend”?
- 19 Page 23; line 21 through 27 – we question this statistic - need a reference.
- 20 Page 25; line 8 through 35 and page 26; line 1 through 36 and page 27; line 1 through 8 – this discussion is confusing and needs work to make it more readable. It may need to be excluded to reduce confusion or its usefulness needs to be documented.
- 21 Page 28; line 7 – somewhere in the discussion of the Central Valley Project there should be an information regarding the water and reclamation districts that are CVP contractors and settlement contractors and the difference between NOD and SOD allocations and why. Also

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- Suggest adding map of special districts that are purveyors and of water within the region.
- 22 Page 31; line 1 through 9 – changes to the TCCA diversion were extensive and critical to the regions environmentally and also in regard to water distribution for agriculture. It seems to be glossed over in this discussion. We suggest getting input from Jeff Sutton to provide an accurate background and cost-share.
 - 23 Page 33; line 8 through 31 – the discussion regarding the SWP is short and non-informative. It should be expanded to discuss how many contractors are included and the difference between contractors and settlement contractors and the limitations on annual water allocations for both.
 - 24 Page 40; line 3 through line 16 – needs clarification on definition of ‘Water Board’, ‘Board’. The term is used four times with no definition. Also, there should be some sort of lead-in into the discussion of water quality indicating that generally the water quality within the region is of high quality.
 - 25 Page 40; line 17 through 41 and page 41 line 1 through 8 – is the CV Salt discussion appropriate here? The language states that it is the most serious long-term water quality issue in the central valley - need a reference. Discussion is not clear regarding who is implementing the CV Salts initiative.
 - 26 Page 42; line 1 through 21 – discussion regarding pesticides is incomplete and it is not understood why it is included.
 - 27 Page 46; line 9 through line 40 and page 47; line 1 through 25 – discussion regarding groundwater conditions and Issues should be moved in front of discussion regarding land subsidence, which currently begins on page 45; line 1. Also, is this where the subsidence discussion referenced on Page 15 concludes? Why are they separated?
 - 28 Page 45; line 37 and 38, last sentence of the paragraph – is this statement supported by science? If so, you need a reference.
 - 29 Page 48; line 5 – need to begin sentence with the word ‘The’ – grammatical error.
 - 30 Page 48; line 13 – need to insert the words ‘and in Butte County’ after ‘west side of Glenn County’, because Durham and Chico are located in Butte County.
 - 31 Page 51; line 30 through line 32 – need to include discussion regarding decline in surface water reliability due to cutbacks sometimes force folks back onto groundwater due to the unreliability of the surface water.
 - 32 Page 54; line 24 through 40 and page 55; line 1 through 18 – is this a repeat of page 22? Why is this in two separate places? Regardless, it should be emphasized that this is estimated.
 - 33 Page 55; line 15 through 18. The last two sentences do not make sense. Does this variation really point to the reliance on groundwater or does it indicate that there are differences in recharge due to precipitation and run-off changes?
 - 34 Page 56; line 5 through 41 and page 57; line 1 through 40 and page 58; line 1 through 12 – need to include discussion regarding status of CVFPP planning efforts.
 - 35 Page 58; line 34 through 41 and page 59; line 1 through 4 – the discussion on IRWMPS is lacking considering how much DWR keeps saying they are expected to address.

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- 36 Page 59; line 13 through 19 – any discussion regarding groundwater governance should include something about Baldwin v Tehama and the fact that groundwater is regulated by the local jurisdictions.
- 37 Page 59; line 32 through 40 and page 60; line 1 through 40 and page 61; line 1 through 45 and
- 38 Page 62; line 1 through 38 – suggest taking this out because it is statewide and not specific to the region.
- 39 Page 64; line 13 through 39 and page 65; line 1 through 31 – suggest removing
- 40 Page 65; line 36 through 41 and page 66; line 1 through 17 – suggest adding in analysis of impacts to agricultural economy and groundwater basins from loss of surface water diversions within the region to meet in-stream flow requirements.
- 41 Page 67; line 1 through line 21 – Why is governance discussed in such a fragmented fashion? IRWMP discussion should include all eight IRWMPs located within the region.
- 42 Page 67; line 21 through 27 – there are other CVFPP planning areas such as the Feather River and the Lower Sacramento/North Delta that are not mentioned here. You should include CVFPP area map. Also, why is this being discussed in more than one place (see page 56)?
- 43 Page 68; line 3 through 8 – need to include historic perspective and PG&E contribution to this project.
- 44 Page 70; line 1 and 2 – Is this the correct title for this section?
- 45 Page 72; line 13 through 34 – IRWMP discussion is interesting. Suggest using the goals and objectives included in each plan as well as the project lists to determine what is important to the regions.
- 46 Page 74; lines 19 through 37 and page 75; lines 1 through 12 – suggest removing from regional report. This is a statewide assessment and is confusing.
- 47 Page 80; line 6 through line 41 and page 81; line 1 through 41 and page 82 lines 1 through 10 – this discussion is confusing and either needs to be set up and captioned or removed.

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